

JOHN L. BURRIS, Esq./ State Bar #69888  
 BENJAMIN NISENBAUM, Esq./ State Bar #222173  
 LAW OFFICES OF JOHN L. BURRIS  
 7677 Oakport Street, Suite 1120  
 Oakland, California 94621  
 Telephone: (510) 839-5200  
 Facsimile: (510) 839-3882

Attorneys for Plaintiff M.H., a minor through his  
 Guardian Ad Litem, Michelle Henshaw

MICHAEL J. HADDAD, Esq./ State Bar #189114  
 JULIA SHERWIN, Esq./State Bar #189268  
 GINA ALTOMARE, Esq./State Bar #273099  
 GENEVIEVE K. GUERTIN, Esq./State Bar #262479  
 HADDAD & SHERWIN  
 505 Seventeenth Street  
 Oakland, CA 94612  
 Telephone: (510) 452-5500  
 Facsimile: (510) 452-5510

Attorneys for Plaintiffs Joseph Harrison, Krystle  
 Harrison, Martin Harrison, Jr., and Tiffany Harrison

**UNITED STATES DISTRICT COURT**

**FOR THE NORTHERN DISTRICT OF CALIFORNIA**

M.H., a minor, through his Guardian Ad Litem,  
 Michelle Henshaw, JOSEPH HARRISON, KRYSTLE  
 HARRISON, MARTIN HARRISON, JR., and  
 TIFFANY HARRISON, all Individually and as Co-  
 Successors in Interest of Decedent MARTIN  
 HARRISON,  
  
 Plaintiffs,  
  
 vs.

COUNTY OF ALAMEDA, a municipal corporation;  
 SHERIFF GREGORY J. AHERN, in his individual and  
 official capacities; DEPUTIES MATTHEW AHLF,  
 ALEJANDRO VALVERDE, JOSHUA SWETNAM,  
 ROBERTO MARTINEZ, ZACHARY LITVINCHUK,  
 RYAN MADIGAN, MICHAEL BARENO,  
 FERNANDO ROJAS-CASTANEDA, SHAWN  
 SOBRERO, SOLOMON UNUBUN, and DOES 1-20,  
 individually, jointly and severally,

Defendants.

Case No. C11-2868 JST (MEJ)

**STIPULATION AND ~~(PROPOSED)~~  
 ORDER TO CONTINUE  
 SETTLEMENT CONFERENCE**

1 ALL PARTIES, THROUGH THEIR RESPECTIVE COUNSEL OF RECORD, HEREBY  
 2 STIPULATE, AND REQUEST THIS COURT TO ORDER, THAT the settlement conference  
 3 currently scheduled before Magistrate Judge James for March 11, 2013 at 2:00 p.m. be rescheduled  
 4 to May 20, 2013. The reasons for this requested continuance are: (1) that, in Plaintiffs' estimation,  
 5 the case is not in a settlement posture due to discovery that remains to be completed and (2)  
 6 Plaintiffs' counsel Haddad & Sherwin have a trial that conflicts with the current settlement  
 7 conference date. Though Plaintiffs' counsel are moving the court to continue that trial due to the  
 8 health concerns of one of the firm's partners, that trial is currently scheduled to begin March 4,  
 9 2013.  
 10

11  
 12 Plaintiffs have not yet had an opportunity to obtain discovery from recently added  
 13 Defendants Corizon Health, Inc., Harold Orr, M.D., and Zelda Sancho, L.V.N. In addition,  
 14 Plaintiffs need to complete several more depositions, including the depositions of six Defendant  
 15 deputies, five persons most knowledgeable pursuant to Federal Rule of Civil Procedure 30(b)(6),  
 16 and several other witnesses. Plaintiffs anticipate these depositions will be completed by May 2013  
 17 and that they will then be in a position to evaluate this case for settlement.  
 18

19  
 20 SO STIPULATED:  
 21

22  
 23  
 24 Dated: February 26, 2013

HADDAD & SHERWIN

25  
 26 /s/ Gina Altomare

27 GINA ALTOMARE

Attorneys for Plaintiffs

28 JOSEPH HARRISON, KRYSTLE HARRISON,  
 MARTIN HARRISON JR., and TIFFANY  
 HARRISON

1  
2 Dated: February 26, 2013

THE LAW OFFICES OF JOHN L. BURRIS

3  
4 /s/ Benjamin Nisenbaum\*

5 BENJAMIN NISENBAUM  
6 Attorneys for Plaintiff  
7 M.H.

8 Dated: February 26, 2013

ANDRADA & ASSOCIATES

9  
10 /s/ J. Randall Andrada\*

11 J. RANDALL ANDRADA  
12 Attorneys for Defendants  
13 COUNTY OF ALAMEDA, GREGORY G. AHERN,  
14 MATTHEW ALHF, ALEJANDRO VALVERDE,  
15 JOSHUA SWETNAM, ROBERTO MARTINEZ,  
16 ZACHARY LITVINCHUK, RYAN MADIGAN,  
17 MICHAEL BARENO, FERNANDO ROJAS-  
18 CASTANEDA, SHAWN SOBRERO, SOLOMON  
19 UNUBUN, and MEGAN HAST, A.S.W.

20 Dated: February 26, 2013

LAW OFFICES OF NANCY E HUDGINS

21 /s/ Matthew M. Grigg\*

22 MATTHEW M. GRIGG  
23 Attorneys for Defendants  
24 HAROLD ORR, JR., M.D., ZELDA SANCHO,  
25 L.V.N., and CORIZON HEALTH, INC.

26 \* Mr. Nisenbaum, Mr. Andrada, and Mr. Grigg provided their consent that this document be  
27 electronically filed.  
28

~~(PROPOSED)~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED. The settlement conference scheduled for March 11, 2013 at 2:00 p.m. is rescheduled for May 20, 2013 at 2:00 p.m. in chambers.

Dated: February 28, 2013

  
\_\_\_\_\_  
HONORABLE MARIA-ELENA JAMES  
United States Magistrate Judge